## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| In re:<br>George A. Paul | )<br>)<br>) | Case No.: 15-20387 CMB<br>Chapter 13               |
|--------------------------|-------------|--|
| Debtor                   | )<br>)      | 31.3p.11.  |
| George A. Paul           | )           | Related Doc.: 58                                   |
| Movant,                  | )<br>)      | Hearing Date: 8/16/2016<br>Response due: 8/15/2016 |
| Vs.                      | )           |  |
| Ocwen Loan Servicing     | )           |  |
| Respondent               | )           |  |

## TRUSTEE'S RESPONSE TO MOTION TO APPROVE TRIAL MODIFICAITON

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel, respectfully represents the following:

- 1. The Trustee recently discovered that Ocwen Loan Servicing had sent "streamlined trial modification letters" to counsel for bankruptcy debtors throughout Pennsylvania, many of which were for borrowers in the Western District.
- 2. Although the letters indicate that the trial payment period would begin in August, counsel for Ocwen has assured the Trustee that later start dates would be acceptable to Ocwen, as the August start date is impractical and problematic due to the fact that the letters were only sent in late July, while Bankruptcy Court approval is needed to implement the trial modification process.
- The Trustee does not oppose the debtor's request for Court approval of the proposed trial loan modification, provided that September 2016 be the first month of the trial payment period.

WHEREFORE, the Trustee requests that approval of the debtor's motion be conditioned on the beginning month for the trial loan payments being made September 2016.

> RONDA J. WINNECOUR, CHAPTER 13 TRUSTEE

8-4-16

by /s/ Richard J. Bedford\_

Date

Richard J. Bedford, PA I.D. 25069 Attorney for Chapter 13 Trustee US Steel Tower – Suite 3250 600 Grant St. Pittsburgh PA 15219

(412) 471-5566

rbedford@chapter13trusteewdpa.com

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| Respondent               | )           |  |

## CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of the foregoing pleading upon the following, by regular United States mail, postage prepaid:

George A. Paul 142 Maplehurst Drive Aliquippa, PA 15001

Lauren M. Lamb, Esquire Steidl & Steinberg Suite 2830, Gulf Tower 707 Grant Street Pittsburgh, PA 15219

Joseph P. Schalk, Esquire Phelan Hallinan Diamond & Jones LLP 126 Locust Street Harrisburg, PA 17101

Joseph S. Sisca, Esquire Assistant U.S. Trustee 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222

<u>Aug. 4, 2016</u> Date S/ Amy T. Sabedra
Administrative Assistant
Office of the Chapter 13 Trustee
US Steel Tower – Suite 3250
600 Grant Street
Pittsburgh, PA 15219
412) 471-5566
cmecf@chapter13trusteewdpa.com